

UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JENNIFER GUILMETTE, on behalf of herself  
and all others similar situated,

Plaintiff,

-against-

BLISS RESTAURANT BAR & CATERING INC.,  
and RONALD HOFFMAN, an individual,

Defendants.

Civil Action No.:  
25-cv-02395

**(PROPOSED)  
SCHEDULING ORDER**

Plaintiff, Jennifer Guilmette (“Plaintiff”), and Defendants, BLISS RESTAURANT BAR & CATERING INC., and RONALD HOFFMAN (“Defendants”) (collectively the “Parties”), through their counsel, submit this Proposed Scheduling Order in accordance with Federal R. Civ. P. 26(f).

**1. GENERAL REQUIREMENTS**

**Fed. R. Civ. P. 26(3)(A): What Changes Should Be Made In The Timing, Form, Or Requirement For Disclosures Under Fed. R. Civ. P. 26(a), Including A Statement As To When Disclosures Required Under Fed. R. Civ. P. 26(a)(1) Were Or Will Be Made.**

The Parties propose the schedule set out below regarding the timing of discovery. The Parties propose that all Parties will exchange Fed. R. Civ. P. 26(a) initial disclosures within seven (7) days of the “so ordered” date of this Proposed Scheduling Order.

**Fed. R. Civ. P. 26(f)(3)(B): The Subjects On Which Discovery May Be Needed, When Discovery Should Be Completed, And Whether Discovery Should Be Conducted In Phases Or Be Limited To Or Focused Upon Particular Issues.**

The parties anticipate that discovery may be needed with respect to the following topics: the facts, circumstances and elements of Plaintiff’s claims and Defendants’ affirmative defenses, the requirements to maintain a collective and/or class action, and the policies and procedures regarding

the payment of wages to Plaintiff. The Parties propose to conduct discovery as to liability and damages pursuant to the schedule set out hereafter.

**Fed. R. Civ. P. 26(f)(3)(C): Any Issues Relating To Disclosure Or Discovery Or Preservation Of Electronically Stored Information, Including The Form Or Forms In Which It Should Be Produced.**

While the Parties expect that some discovery will be in electronic form, the Parties do not anticipate any issues relating to disclosure or discovery of electronically stored information. If issues arise, the Parties will meet and confer in an attempt to resolve any ESI, before submitting such issues to the Court for resolution.

**Fed. R. Civ. P. 26(f)(3)(D): Any Issues Relating To Claims Of Privilege Or Of Protection As Trial-Preparation Material, Including – If The Parties Agree On A Procedure To Assert Such Claims After Production – Whether To Ask the Court To Include Their Agreement In An Order Under Federal Rule of Evidence 502.**

The Parties do not anticipate any issues relating to contested claims of privilege. To the extent any issues arise, the Parties will prepare a Proposed Confidentiality Order that will be submitted to the Court for approval to govern the procedure to assert such claims after production.

**Fed. R. Civ. P. 26(f)(3)(E): What Changes Should Be Made In The Limitations Of Discovery Imposed Under These Rules Or By Local Rule, And What Other Limitations Should Be Imposed.**

The Parties do not anticipate changes in the limitations on discovery under these rules or by Local Rule.

**Fed. R. Civ. P. 26(f)(3)(F): Any Other Orders The Court Should Issues Under Rule 26(c) Or Under Rule 16(b) And (c).**

None.

## **2. PROPOSED DEADLINE AND COURT APPEARANCES**

The Parties submit the following proposed deadlines and court appearances:

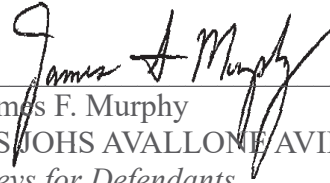
Deadline for exchange of initial disclosure required by Rule 2(a):	Within seven (7) days of adoption of Proposed Scheduling Order by the Court.
First Interrogatories and Document Demands:	September 8, 2025
Responses to First Interrogatories and Document Demands:	October 22, 2025
Filing of Plaintiff's anticipated motion for conditional FLSA certification:	November 1, 2025
Motions to join new parties or amend the pleadings:	November 14, 2025
Status conference in courtroom 820:	TBD by Court
Completion of depositions:	January 21, 2026
Completion of all discovery:	April 6, 2026
Identification of case-in-chief experts and service of Rule 26 disclosures:	N/A
Identification of rebuttal experts and service of Rule 26 disclosures:	N/A
Commencement of Plaintiff's anticipated motion for class certification:	April 27, 2026
Commencement of summary judgment motion practice:	May 11, 2026
Pretrial conference in courtroom 820:	TBD by Court

Dated: August 18, 2025



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